

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PANASONIC HOLDINGS CORPORATION,

Plaintiff,

v.

BROADCOM CORPORATION,

Defendant.

CASE NO. 6:22-cv-00755-ADA

JURY TRIAL DEMANDED

JOINT MOTION TO EXTEND STAY

Plaintiff Panasonic Holdings Corporation (“Panasonic”) and Defendant Broadcom Corporation (“Broadcom”) (together, “the Parties”) hereby file this joint motion to extend the stay currently in place as a result of the Court’s January 17, 2023 Order Granting the Motion to Stay (“the Order”). The Parties understand that the Order called for the submission of a Scheduling Order if the case was not dismissed by April 18, 2023; however, for the reasons set forth below and to promote judicial economy and conserve party and judicial resources, the Parties respectfully seek leave to keep the current stay in place.

Over the past three months, the Parties have made substantial progress toward settlement, including ongoing video conferences between the Parties’ respective international representatives and other discussions among outside counsel. The Parties have resolved many disputes and have recently begun exchanging several drafts of a preliminary, non-binding term sheet in which only two material terms remain to be

negotiated. In view of this progress, the Parties hope to reach agreement on the two outstanding deal terms in the near future.

In order to allow the Parties time to complete negotiations, including the opportunity to schedule and complete final stage face-to-face meetings as necessary, the Parties request an additional eight week extension of the current stay, through June 19, 2023. The Parties expect that this additional time will allow for the finalization of a settlement to resolve this litigation, or a determination that despite best efforts settlement is not possible and that litigation should commence. If, at the end of such stay, the Parties have not finalized an agreement and filed a Stipulation of Dismissal, then the Parties will promptly file a Joint Status Report and an Amended Scheduling Order.

DATED: April 17, 2023

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served on April 17, 2023, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a). Any other counsel of record will be served by electronic mail on this same date.

/s/ Paige Arnette Amstutz

Paige Arnette Amstutz